UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER VICTOR GRUPE,

Defendant.

SUPERSEDING INDICTMENT

18 U.S.C. § 1030(a)(5)(A)

CR 17-90 PJS/DTS

THE UNITED STATES GRAND JURY CHARGES THAT:

1. At all times relevant to this Indictment, defendant CHRISTOPHER VICTOR GRUPE was a resident of the State of Minnesota. From in or about September 2013 until on or about December 15, 2015, defendant was employed as an IT professional working for Canadian Pacific Railway in Minnesota.

2. On or about December 3, 2015, GRUPE was suspended for insubordination by Canadian Pacific after getting into a verbal altercation with his supervisor.

3. On December 15, 2015, GRUPE was notified by Canadian Pacific that he was going to be fired. At GRUPE's request, he was permitted to resign. GRUPE submitted a letter to Canadian Pacific via email on December 15, 2015 indicating that he was resigning and that his resignation was effective that same day. In his letter, GRUPE indicated that he would return all company property to the Canadian Pacific office in Minneapolis, Minnesota.

4. On December 17, 2015, before returning his company-issued laptop computer, GRUPE used the laptop to access Canadian Pacific's computer network. Once

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on the network, GRUPE deleted data, including deleting some system administrator accounts entirely and changing passwords for other system administrator accounts. GRUPE also attempted to delete logging information on the Canadian Pacific computer network that would have revealed his activity.

5. Later in the day on December 17, 2015, GRUPE returned the company-issued laptop computer to Canadian Pacific. Before returning the computer, GRUPE wiped all data from the hard-drive.

6. On or about January 6, 2016, Canadian Pacific began experiencing network problems, which Canadian Pacific IT staff attempted to correct. Because GRUPE had deleted some system administrator accounts and changed passwords to other system administrator accounts, no one at Canadian Pacific was able to access a critical portion of the network. Canadian Pacific began an incident investigation, which included hiring an outside computer security company to assist in identifying and correcting the problem. On January 7, 2016, Canadian Pacific was able to restore the system administrator accounts through a process that resulted in a network outage and thereafter regained system administrator access to the computer network. A subsequent investigation by Canadian Pacific IT staff and the outside computer security company hired by Canadian Pacific concluded that GRUPE had deleted system administrator accounts, changed passwords for system administrator accounts, and wiped network logs that recorded his activities.

COUNT 1

(Intentional Damage to a Protected Computer)

On or about December 17, 2015, in the State and District of Minnesota, the defendant,

CHRISTOPHER VICTOR GRUPE,

did knowingly and without authorization cause the transmission of programs, code, and commands, and as a result of such conduct, intentionally caused damage to protected computers, and as a result of such conduct, the defendant caused loss to Canadian Pacific during the period from December 17, 2015 to December 17, 2016, of an aggregate value of more than $5,000.00, all in violation of Title 18, United States Code, Sections 1030(a)(5)(A) and (c)(4)(B)(i).

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON